ADDENDUM #2 TO OBSERVATION REPORT #41

KPMG observed missing, unknown, incorrect and untimely charges on several bills.

<u>Issue 41.14</u>

KPMG was billed for usage generated on 1/31/00, though the usage billing cycle from and thru dates are 12/31/99 and 1/30/00, respectively. Following is the bill information for this charge:

Bill Number and Bill	Telephone	Call	Connect	Connect	Usage Appearing
Date	Number	Date	Hour	Minute	on the Bill
508 Q05-0135 135	617-696-6394	1/31/00	7 (pm)	23	Phonesmart (*69) -
1/31/00					\$0.41

The appearance of this usage is contrary to the format specified by the Billing Output Specifications. In addition, usage is not billed in the timeframe in which it is expected.

<u>Issue 41.15</u>

KPMG was charged more than it should have been for a local usage generated by an end user during the 12/31/99 bill period.² The following table illustrates this instance:

Telephone Number	Minutes Expected from DUF	Messages Expected from DUF	Minutes Appearing on Bill	Messages Appearing on Bill	Expected Charge	Actual Charge on Bill
413-564-8314	1	2	9	11	\$0.02	\$0.08
					(messages)	(messages)
					\$0.01	\$0.11
					(minutes)	(minutes)

KPMG expected that two local calls would comprise the local usage generated by this end-user for the 12/31/99 bill period. Following is some information about those calls for the purpose of identifying the call records:

Called From Number	Called To Number	Date of Call	Connect Time	Connect Time	Call Duration	Call Duration
			Hour	Minute	Minute	Second
413-564-8314	4135684214	12/7/99	11	24	0	41
413-564-8314	4137335131	12/14/99	10	36	0	0

¹ The Billing Output Specifications, SR – 1874, Vol. 4 – U21 defines *Usage Billing Cycle Thru Date* as the following: "For current usage, this represents the last date of the billing cycle in which the usage is billed."

² The associated bill number is 508 Q05-0135 135. The rates KPMG used to calculate local usage charges can be found in DTE MA #10, Section 1.5.1, p. 14. These rates were then discounted by 24.99% per the reseller discount. The per minute rate KPMG used to perform the calculations is \$0.012002. The per message rate used is \$0.007501.

Issue 41.16

KPMG was charged more than it should have been for toll calls made by its end users. The following table illustrates some examples of those instances:³

#	Telephone Number	Call Date	Connect Time Hour	Connect Time Minute	Conversa tion Time Minute ⁴	Conver sation Time Second	Expected Charge	Actual Charge on Bill
1	413-564-8306	12/17/99	9	57	0	17	\$0.02	\$1.15
2	413-564-8314	12/14/99	10	40	1	5	\$0.05	\$1.18
3	781-263-7010	12/14/99	10	39	0	30	\$0.04	\$0.20
4	781-292-9672	12/16/99	11	37	0	49	\$0.06	\$0.20

Issue 41.17

KPMG was not billed for usage generated by BTN 781-368-0195 that should have appeared on KPMG's 12/31/99 resale bill (number 508 Q05-0135 135).⁵ Following are the DUF records that include the usage data for this telephone number.

#	Category	Group			To Number		Connect	Connect	Connect
			Type	Number		Date	Time	Time	Time
							Hour	Minute	Second
1	10	01	31	7813680195	7812767749	12/16/99	8	4	29
2	01	01	31	7813680195	7813680192	12/16/99	8	21	43
3	10	01	31	7813680195	7812767749	12/16/99	8	24	42
4	10	01	31	7813680195	7812767749	12/16/99	8	25	33
5	10	01	31	7813680195	7812767749	12/17/99	8	0	57
6	10	01	31	7813680195	7812767749	12/17/99	8	15	36
7	10	01	31	7813680195	7812767749	12/17/99	8	16	30
8	10	01	31	7813680195	7813680166	12/17/99	8	42	29
9	10	01	31	7813680195	7813680166	12/17/99	8	54	53
10	10	01	31	7813680195	7817296100	12/7/99	11	42	38
11	01	01	16	7813680195	7813680195	12/15/99	9	5	2
12	01	01	16	7813680195	7813680195	12/15/99	9	14	52
13	10	01	31	7813680195	7813680194	12/15/99	10	19	23
14	01	01	16	7813680195	7813680195	12/15/99	10	19	46

 $^{^{3}}$ All of these instances appear on KPMG's resale bill for the 12/31/99 bill date. The bill number is 508 Q05-0135 135.

⁴ According to DTE MA Tariff #10, Part A, Section 9.5.2.E, p. 12, "...the charges for an individual call will be determined based upon the actual conversation time of each call in one second increments." KPMG applied usage rates in accordance with these rules. The rates applied by KPMG appear in DTE MA #10, Section 1.9.1, pp. 30 and 31 and were adjusted to reflect the 24.99% reseller discount. For items 1 and 2, the per message rate used for the calculations is \$0.007501; the per minute rate used is \$0.041256. For items 3 and 4, the per message rate used is \$0.060008.

⁵ This usage also did not appear on the 1/31/00 resale bill. This suggests, therefore, that the usage was *not* re-circulating, which could explain in some cases why usage might not appear as expected on a bill.

#	Category	Group	Record		To Number	Call	Connect	Connect	Connect
			Type	Number		Date	Time	Time	Time
1.5	0.1	0.1	1.0	7012600105	7012600105	10/15/00	Hour	Minute	Second
15		01	16		7813680195		10	42	31
16		01	16		7813680195		10	54	48
17	10	01	31		7812767749	12/16/99	9	13	32
18	10	01	31		7813680192	12/16/99	9	22	3
19	10	01	31		7813680192	12/16/99	9	49	3
20	10	01	31		7812767749	12/16/99	9	50	0
21	01	01	31		7813680192	12/16/99	9	59	23
22	01	01	31	7813680195		12/16/99	10	17	4
23	10	01	31		7812767749	12/16/99	10	19	44
24	10	01	31		7812767749	12/16/99	10	30	40
25	10	01	31	7813680195		12/17/99	9	3	27
	10	01	31		7812767749	12/17/99	9	10	25
27	10	01	31		7813680169	12/17/99	9	18	55
28	10	01	18		7812728667	12/17/99	9	3	27
29	10	01	19	7813680195	7813680192	12/16/99	10	21	50
30	10	01	19	7813680195	7813680166	12/17/99	8	53	14
31	10	01	31	7813680195	6179881319	12/15/99	8	52	54
32	10	01	31	7813680195	6179881319	12/15/99	8	54	24
33	10	01	31	7813680195	6179881319	12/16/99	8	0	22
34	10	01	31	7813680195	6179881319	12/16/99	8	3	49
35	10	01	31	7813680195	6179881319	12/16/99	8	6	10
36	10	01	31	7813680195	6179881319	12/16/99	8	8	33
37	10	01	31	7813680195	6179881319	12/16/99	8	17	0
38	10	01	31	7813680195	6179881319	12/16/99	8	33	41
39	10	01	31	7813680195	6179881319	12/16/99	8	54	49
40	10	01	31	7813680195	6179881319	12/17/99	8	43	56
41	10	01	31	7813680195	6179881520	12/7/99	11	45	10
42	10	01	31	7813680195	6179881319	12/15/99	10	56	46
43	10	01	31	7813680195	6179881319	12/16/99	10	34	49
44	10	01	31	7813680195	6179881319	12/17/99	9	49	59
45	10	01	01	7813680195	9785510055	12/15/99	9	6	28
46	10	01	01	7813680195	9785510055	12/15/99	9	20	41
47	10	01	01	7813680195		12/16/99	8	9	31
48	10	01	01		9786862396	12/16/99	8	31	37
49	10	01	01		9783746091	12/17/99	8	10	21
50	10	01	01		9783746091	12/17/99	8	21	59

Assessment

If CLECs are not billed charges that are complete, known, correct and billed in a timely manner they will have difficulty billing their end users appropriately.